

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

ROCHELLE GLASGOW, *et al.*,

Plaintiffs,

vs.

DANIEL J. BEERS, *et al.*,

Defendants.

CASE NO. 5:21-CV-02001-DAR

JUDGE DAVID A. RUIZ

**DECLARATION OF DORSEY W.  
MORROW**

I, Dorsey W. Morrow, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over 18 years of age.
2. I make this Declaration based upon facts known personally by me.
3. I am the current Chief Executive Officer (“CEO”) of Gospel Light Mennonite Church Medical Aid Plan, Inc. d/b/a Liberty HealthShare (“Liberty Healthshare”).
4. In my capacity as CEO, I am familiar with records and contracts relating to Liberty Healthshare.
5. On March 15, 2021, Liberty Healthshare, along with the former National Coalition of Health Care Sharing Ministries, Inc., Druzilla Abel, Dale Bellis, and Larry Foster (collectively, the “Liberty Parties”) executed a Settlement Agreement (“Liberty Settlement Agreement”) with the State of Ohio, *ex rel.*, Dave Yost, Ohio Attorney General, pursuant to the Ohio Attorney General’s authority to enforce and oversee charitable trusts.

**EXHIBIT A**

6. A true and accurate copy of the Liberty Settlement Agreement, dated March 15, 2021, is attached hereto and incorporated herein as Exhibit A-1.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 12, 2022

/s/ Dorsey W. Morrow  
Dorsey W. Morrow